

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NEC CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-987 (CJB)
)	
PELOTON INTERACTIVE, INC.,)	
)	
Defendant.)	

**STIPULATION AND [PROPOSED] ORDER TO
COMPLETE DEPOSITIONS AFTER THE CLOSE OF FACT DISCOVERY**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff NEC Corporation and Defendant Peloton Interactive, Inc., through their undersigned counsel and subject to the approval of the Court, that notwithstanding the October 3, 2025 close of fact discovery (*see* D.I. 220), the parties agree to complete the depositions of certain fact witnesses as follows: Katie McNabb on October 7, 2025; Raul Santos on October 10, 2025; Doug Crossley on October 10, 2025; Santhosh Mankala on October 14, 2025; Kevin Zetterstrom on October 15, 2025; and Sam Walter on October 17, 2025.

The parties agree that the depositions shall be treated for all purposes as if they were conducted within the fact discovery period.

No deadlines in the Amended Scheduling Order (D.I. 220) are otherwise affected or modified by this stipulation.

Dated: September 4, 2025

MORRIS JAMES LLP

/s/ Cortlan S. Hitch

Kenneth L. Dorsney (#3726)
Cortlan S. Hitch (#6720)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
(302) 888-6800
kdorsney@morrisjames.com
chitch@morrisjames.com

Attorneys for Plaintiff NEC Corporation

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Karen Jacobs

Karen Jacobs (#2881)
Michael J. Flynn (#5333)
Cameron P. Clark (#6647)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
kjacobs@morrisnichols.com
mflynn@morrisnichols.com
cclark@morrisnichols.com

*Attorneys for Defendant
Peloton Interactive, Inc.*

SO ORDERED this ____ day of September, 2025.

The Honorable Christopher J. Burke